

EXHIBIT A

UNITED STATES DISTRICT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BROKERARTE CAPITAL PARTNERS,
LLC,

Case No.

Honorable

Plaintiff,

v.

THE DETROIT INSTITUTE OF ARTS,

Defendants.

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Neil E. Youngdahl (P82452)
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[PROPOSED] ORDER PENDING HEARING

Plaintiff's Motion for Temporary Restraining Order and Possession Pending Final Judgment having been read and filed, and the Court finding that good cause has been shown,

NOW, THEREFORE, IT IS ORDERED that pursuant to Federal Rules of Civil Procedure 64 and 65 and Michigan Court Rule 3.105(E), Defendant Detroit Institute of Art is hereby ordered to refrain from damaging, destroying, concealing, disposing, moving, or using as to substantially impair its value, the item described as follows: the 1888 painting created by Vincent van Gogh entitled "Liseuse De Romans" a/k/a "The Novel Reader" a/k/a "The Reading Lady" (referred to herein as "the Painting").

IT IS FURTHER ORDERED that, if the Defendant has any defense to the motion for immediate possession or reasons why the Painting should not be taken, Defendant shall file a response to Plaintiff's motion on or before _____. Plaintiff shall file a reply on or before _____. The Court shall hear oral argument on Plaintiff's motion for immediate possession on _____ at _____ am/pm. If Defendant fails to appear at the time and place set forth above, the Court is empowered to issue an order directing that the Painting described be taken from Defendant and/or such other individuals in possession of the Painting pending final judgment on the Plaintiff's Complaint.

Date: January __, 2023

_____/s/_____

Hon. _____
United States District Court Judge

Respectfully submitted,

VARNUM LLP
Attorneys for Plaintiff

Date: January 10, 2023

By: /s/ Aaron M. Phelps
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